

LEAV & STEINBERG, LLP

ATTORNEYS AT LAW

120 BROADWAY, 18TH FLOOR
NEW YORK, NEW YORK 10271
(212) 766-5222
FAX (212) 693-2377

EMAIL: LAWYERS@LEAVANDSTEINBERG.COM
WEBSITE: WWW.LEAVANDSTEINBERG.COM

JAN - 7 2008

UNITED STATES DISTRICT COURT

DANIEL T. LEAV
EDWARD A. STEINBERG

JOSEPH P. STODUTO
DANIELA HENRIQUES
ALEXANDER KRAN III

BRONX OFFICE:
2705 EASTCHESTER ROAD
BRONX, NEW YORK 10469
(718) 515-4357

January 7, 2008

VIA FACSIMILE 1-212-805-7927

Judge Naomi Buchwald
United States District Court, Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: Alice Haber v. National Railroad Passenger Corp. (Amtrak), etc.
Index #: 07 CV 7060

Dear Hon. Judge Buchwald:

This firm represents the plaintiff in this personal injury action. Pursuant to Your Honor's October 4, 2007 Order all discovery was to be completed and all parties were to appear for a Conference on January 15, 2008 at 2:30 p.m. At this point, discovery is not yet complete. Documentary discovery from the defendants (which we have been assured will be forthcoming within a week) has not yet been received and defendants' witness has not yet been produced for deposition. Plaintiff's deposition was recently completed on January 4, 2008 (she is elderly and infirmed and there was some delay in arranging her trip from her home in Maryland to New York). The transcript of that deposition has not yet been received, reviewed or exchanged. Defendants' counsel did request certain authorizations at that deposition and those will be forwarded very shortly. Also, plaintiff will be providing expert medical exchange to the defendants within the next week.

At this point, in addition to those items noted as outstanding above, the defense will require a physical examination of the plaintiff and possibly a non-party deposition of the plaintiff's son Louis Haber - who arrived at the scene of the accident shortly after it occurred.

Endorsement

The requested adjournment of the discovery date until February 29, 2008 is granted. The parties are directed to appear for a conference on March 11, 2008 at 4:30 p.m.

So Ordered.

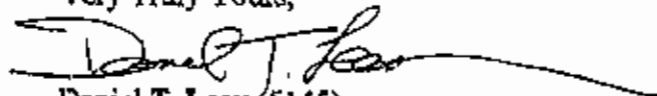
January 15, 2008

Handwritten signature: Kami Davis-Friedman, 1/15/08

In view of the above, it is respectfully requested that the discovery period be extended 45 days to February 29, 2008. I have spoken to defendants' counsel and they consent to this application.

Thank you.

Very Truly Yours,



Daniel T. Leav (5145)

Cc:
Joel Padilla, Esq.
LANDMAN CORSI BALLAINE & FORD
120 Broadway, 27th floor
New York, NY 10271
VIA FACSIMILE 1-212-238-4848 only